State of Tennessee LWDA Assessment

Sprint 1 – Northeast Tennessee

February 4, 2019-February 15, 2019

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Building a better working world

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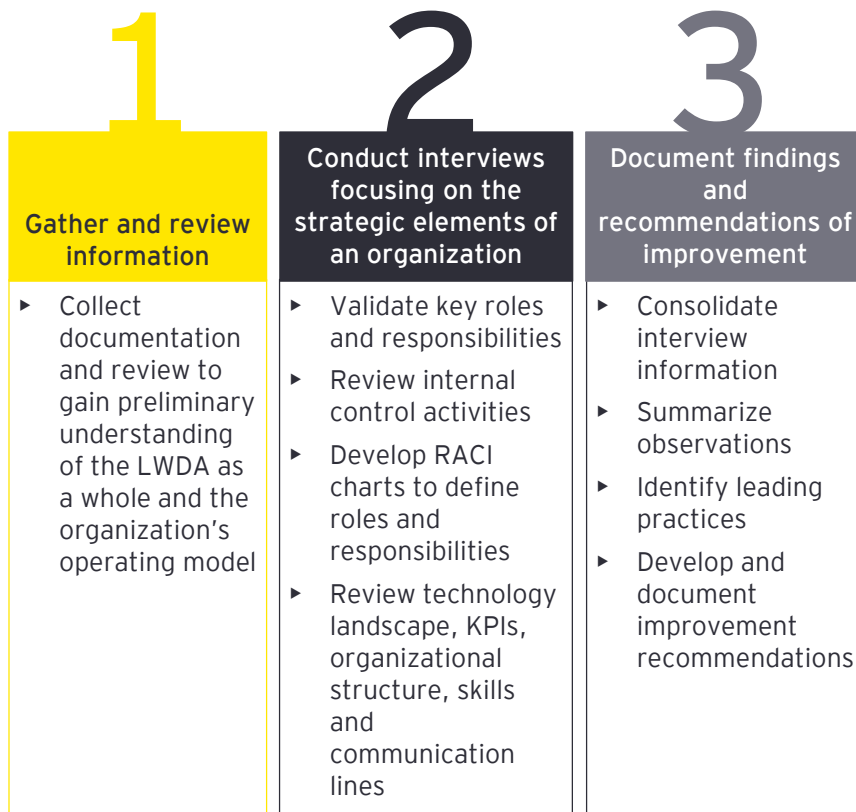
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Executive summary

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Summary of observations

- There is an opportunity to enhance the NETLWDA Strategic Plan by including a road map detailing key initiatives and milestones in order to support and improve planning, prioritization and accountability.

- Opportunities exist to enhance documentation of the organizational structure to clarify roles, accountable parties and dependencies, particularly between the NETLWDA and the TDLWD.

- Stakeholders' visibility into the effectiveness of the local workforce system is limited due to undefined performance management expectations, narrow dashboards and reports, and unclear roles and responsibilities.

- Control activities have not been consistently identified or documented within NETLWDA's policies and procedures.

- Opportunities to improve or strengthen internal controls within the NETLWDA exist within the following areas:
  - Documentation of key policies and procedures
  - Implementation and documentation of monitoring controls and activities performed
  - RFP evaluation committee and evaluation criteria
  - Monitoring and oversight of service provider performance
  - Data integrity, invoice timeliness and accurate reporting

- There are opportunities to optimize communication channels with State Board and among Local Workforce Development Area stakeholders to increase collaboration and strengthen relationships.

- The NETLWDA faces technology limitations that lead to process inefficiencies.

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Assessment approach
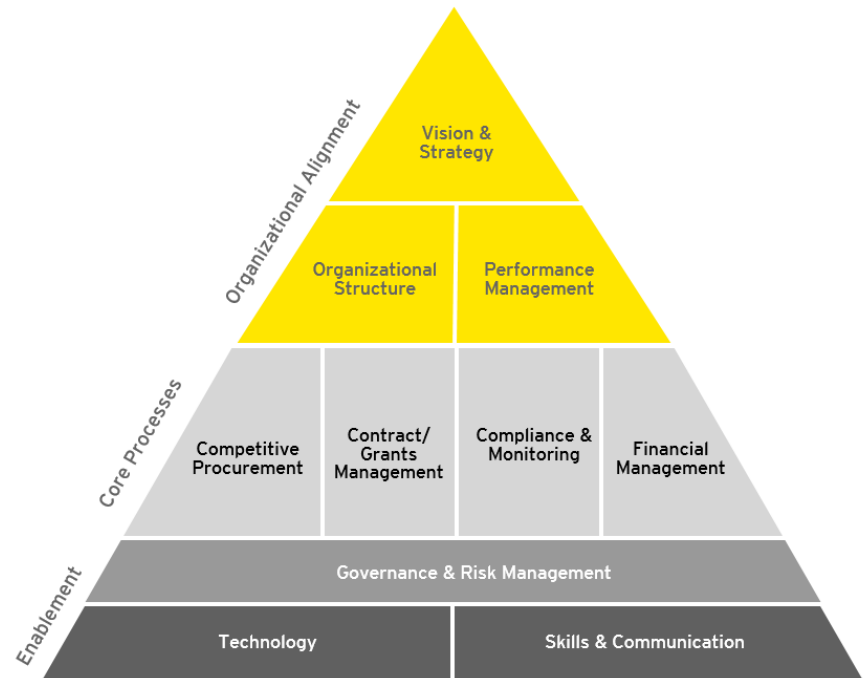
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Our framework

EY assessed the organizational fitness and operational controls of the NETLWDA by using a holistic framework that focused on strategic elements of an organization.

Assessment methodology

1 Gather and review information

▸ Collect documentation and review to gain preliminary understanding of the LWDA as a whole and the organization's operating model

2 Conduct interviews focusing on the strategic elements of an organization

▸ Validate key roles and responsibilities

▸ Review internal control activities

▸ Develop RACI charts to define roles and responsibilities

▸ Review technology landscape, KPIs, organizational structure, skills and communication lines

3 Document findings and recommendations of improvement

▸ Consolidate interview information

▸ Summarize observations

▸ Identify leading practices

▸ Develop and document improvement recommendations

Strategic elements of an organization

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Organizational alignment
Vision and strategy

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NETLWDA strategy

There is an opportunity to enhance the NETLWDA Strategic Plan by including a road map detailing key initiatives and milestones to support and improve planning, prioritization and accountability.

Focus area	Key observation
Strategic vision	The NETLWDA Strategic Plan outlines key initiatives and targets and includes role and responsibilities of key partners to enable strategic alignment. The Strategic Plan is forward-looking, with a multiyear horizon, and internally reviewed on an annual basis, leveraging internal metrics, local needs and local market insights. NETLWDA Leadership, including the CLEO, Chair to the Local Board and Executive Director, are well versed in their responsibilities and accountability related to the NETLWDA. They demonstrate understanding of strategic focus areas and local needs, and defined opportunities to improve service levels.
Road map to achieve strategic outcomes	Although there is a Strategic Plan that includes key strategic areas for the following four years, it lacks a robust strategy road map to outline the transformation journey to achieve strategic outcomes. Key stakeholders and leadership understand the strategic priorities; however, a road map will keep stakeholders aligned and committed to defined strategic priorities and improve the decision-making and planning process necessary to achieve them.
Strategy enabling technology	In the Strategic Plan, the NETLWDA convened a technology team to research and implement technology strategies across the NETLWDA with the goal of facilitating access to services for all eligible participants. Roles and responsibilities of this technology team have not been defined, and there is no project list detailing current initiatives.

Recommendations

▸ Develop a road map to achieve strategic outcomes. This will serve as a guide to key stakeholders regarding the future vision for the NETLWDA. It should include detailed plans for future initiatives with key milestones and updated as needed with input from key stakeholders.

▸ Further formalize the NETLWDA Technology team through a written document that outlines technology initiatives, timeline and team responsibilities.

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Organizational alignment

Organizational structure

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Roles and responsibilities

Opportunities exist to enhance documentation of the organizational structure to clarify roles, accountable parties, and dependencies, particularly between the NETLWDA and the TDLWD.

Focus area	Key observation
Roles and responsibilities	Overall interviewed stakeholders clearly understood their roles and responsibilities including their reporting requirements and expectations. They confirmed there is active collaboration that supports timely issue resolution, decision-making and accountability. Interviewees indicated that the organizational structure is complex, leading to confusion related to reporting lines, channels of communication and governance structure. Institutional knowledge has allowed the NETLWDA to operate despite these challenges; however, clarity of organizational structure would increase efficiency of operations. The responsibilities and accountabilities of the Regional Director position were not clearly understood, specifically with tasks that may be shared with the Executive Director, which leads to general confusion on division of responsibilities.
Span of influence	Span of influence is high for the Executive Director based on institutional knowledge and extensive experience within the Local Workforce Area. She is recognized by NETLWDA stakeholders as a trusted advisor and driver of strategic outcomes and direction.

Recommendations

▸ Document the NETLWDA organizational governance structure to include all key stakeholders to clearly define responsibilities, reporting layers, management accountability and authority to support strategic decision-making. Documenting the organizational structure will assist stakeholders understand overall structure given its complexity due to multiple layers of reporting (see Appendix C).

▸ Develop a communication and education plan to help mitigate any open questions around the overall NETLWDA organizational governance structure.

▸ Communicate the Regional Director's position description with more in-depth detail regarding level of authority, collaboration and communication with other key NETLWDA stakeholders.

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Organizational alignment

Performance management

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Performance management

Stakeholders' visibility into the effectiveness of the local workforce system is limited due to undefined performance management expectations, ineffective dashboards and reports, and unclear roles and responsibilities.

Focus area	Key observation
Ownership and accountability	Ownership and responsibilities specific to performance management at the various entities within the workforce system are not well defined or understood. There is ambiguity in the responsibilities for measuring Board performance among the various roles in the workforce system (LWDB, OSO, CSP and Fiscal Agent). Some examples include: ▸ The NETLWDA strategic plan refers to service provider contracts to define required outcomes and quality standards; however, specific outcomes and standards other than negotiated performance measures are not clearly defined within the contracts. ▸ The strategic plan states that success is measured by attaining performance metrics for employer engagement, but does not state what those metrics are or who is responsible for monitoring them. The CSP contract includes a section for employer measures (penetration rate and repeat business customer rate) but there is no specific target or metric defined. The final contract states "TBD" as the metric.
Local Board performance	Aside from the negotiated performance measures, it is not clear how the Board and key executives (i.e., the CLEO) are measuring the success of the local workforce system as a whole.
Quality of reports and dashboards	The LWDB lacks meaningful, actionable reports in order to drive strategic decisions and continuous improvement. Current reporting to the LWDB focuses on data points for various programs and negotiated metrics. The data presented lacks context in connection with the overall goals and objectives. Enhanced reporting would equip the Board with useful information to drive better decision-making.

Recommendations

▸ We recommend that dashboards and reports be presented in a way that clearly links metrics to strategic goals, which should be defined and articulated by the LWDB and CLEO.

▸ We recommend that reports include historical data to identify meaningful trends.

▸ We recommend incorporating data analytics where applicable.

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Governance and risk management
Internal controls

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Policies and procedures

Several key policies and procedures are either not documented, not documented in sufficient detail or not customized to reflect the practices at the NETLWDA.

Observation	Leading practice
▸ There is a lack of dedicated policies or Standard Operating Procedures (SOPs) that have been developed by the LWDB for key processes. ▸ A significant amount of process knowledge is held by few individuals. This poses a business continuity risk should there be unexpected turnover; this risk is exacerbated by the lack of thoroughly documented policies and procedures. ▸ Without established policies and procedures to clearly set out expectations and document internal controls, there is an increased risk of inconsistent practices and a lack of accountability over the execution of key controls. This may lead to process breakdowns, inefficiencies, or errors in transaction processing or reporting.	▸ The organization has thoroughly documented key business policies and procedures, assisting with standardization across the organization, and allowing management to identify potential risks and inefficiencies. Documented policies and procedures also serve to mitigate risks associated with business continuity and succession planning.

Recommendations

▸ We recommend the NETLDWA document and update policies and procedures to reflect processes currently in place within the area. Documentation should include a description of control activities, as well as document ownership of key items.

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OSO and CSP procurement — Evaluation Committee

Opportunities exist to improve policies around the RFP Evaluation Committee to verify that the committee has the appropriate skills and training to adequately score responses.

Observation	Leading practice

▸ During the RFP process, the Executive Director/Staff to the Board acts as RFP coordinator. The RFP coordinator formed an evaluation committee who was delegated responsibility for reviewing and scoring RFP responses and making a collective recommendation to the LWDB. During our interviews and review of RFP documentation, we noted the following control weaknesses:
  ▸ There is an informal process for forming the committee and verifying competence of members. Requirements for committee members are not defined or documented.
  ▸ Per the LWDB/AB&T documented process for formal competitive procurement, the evaluation committee received TDLWD recommended training. We inspected the presentation used to train the evaluation committee on August 30, 2018 and found it to lack sufficient details to appropriately train committee members on how to evaluate and score RFPs.
  ▸ Several of the scoresheets were completed prior to the training on August 30, 2018 and there is no documentation recording the attendance of committee members.
	▸ The RFP Evaluation Committee should be made up of individuals with various area of knowledge (i.e., financial, procurement, career services). The RFP coordinator is responsible for forming a cross-functional team who is knowledgeable and impartial.
	
	▸ Based on subject-matter knowledge or functional area, it may be appropriate for each evaluation committee member to be assigned only a specific section of the proposal to review and score.
	
	▸ Smaller organizations may choose to outsource the RFP process if they determine that their time will be more impactful spent elsewhere. Outsourcing the RFP process can reduce workload and operational costs.

Recommendations

▸ We recommend that all LWDB members receive periodic training on RFP evaluation to increase the pool of eligible evaluation committee members. Evaluation committee members should receive a refresher training when selected for an upcoming RFP. Attendance of training should be mandatory and documented.

▸ We recommend that the LWDB develop and document leading practices for RFP evaluation committees. This should include:
  ▸ Minimum requirements of knowledge represented within the evaluation committee and process for appointing/selecting members (requirements of knowledge may vary, depending on the service being procured).
  ▸ If required expertise is not available, consider outsourcing the RFP process.

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OSO and CSP Procurement – scoring

RFP scoring does not follow recognized leading practices.

Observation	Leading practice
▸ Scoring approach does not include specific evaluation criteria and key metrics that can be leveraged to score RFP responses. The scoresheet restates each of the questions from the RFP, but does not provide the scorer with expectations or guidance on what to look for in the responses. ▸ The scoresheet does not include an open-ended or comments for the scorer to document their scoring justification. ▸ Names and other identifying information about the entity were not removed from RFP responses before they were provided to the evaluation committee, which could have impacted the evaluation committee's ability to remain impartial and objective in scoring the responses.	▸ RFP evaluation criteria is clearly defined and documented, increasing consistency in scoring across judges and setting clear expectations for scorers. ▸ Scoring is blind (process by which evaluators rate the responses without specific knowledge of which entity is tied to which answer) reducing the risk of bias in the RFP process. ▸ Use distinct weightings. This method allows each criterion to be measured on the same scale. Each also has a weight by which the score is multiplied to give it a total weighted score. This makes scoring easy and confirms that the most important criteria are given greater consideration. ▸ Scoresheets include simple scales (0–5 or 0–10). ▸ Incorporate technology into the RFP scoring process.

Recommendations

▸ We recommend that RFP scoring is performed blind. We recommend that RFP evaluation criteria is specifically outlined in sufficient detail to enable consistent interpretation of responses. We recommend that the RFP score sheet is updated to include free text fields where RFP scorers can document their rationale for scores.

▸ We recommend utilizing technology (such as Excel) to quickly gather and calculate weighted scores

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Contract management

Monitoring and oversight of service provider performance is informal. Service quality and performance expectations beyond federal and state requirements are not clearly defined in the contracts, and consequently are not monitored or reported to the LWDB.

Observation	Leading practice

▸ Per the local Strategic Plan, LWDB uses an oversight, monitoring and system performance improvement evaluation process which includes ongoing review and assessments of service providers' performances. However, we noted the following gaps in LWDB's process and controls for monitoring the OSO and CSP:
 	
  ▸ OSO and CSP contracts do not include clearly defined service expectations (set by LWDB) in measurable terms and obligations for when expectations are not met, limiting the ability of the LWDB to monitor performance.
 	
  ▸ During interviews, it was apparent that the differentiation between service quality expectations and Federal/State performance requirements was not clear.
 	
    ▸ Apart from the negotiated performance measures required by WIOA (which are owned and measured by the TDLWD), the LWDB has not defined criteria or a formal process to evaluate the OSO and CSP performance and effectiveness.
	▸ All outsourcing contracts include service-level agreements (SLAs).
	
	▸ The contract owner should be the main author of the SLA as they set the expectations for service delivery and quality that they require.
	
	▸ Information included within a SLA must be measurable, clear and concise to aid in understanding. The SLA should describe the mechanism for escalating and resolving issues related to the delivery of services.

Recommendations

▸ We recommend that each contract (upon re-bid) is reviewed to determine if further service-level requirements should be included within the contract. Monitoring of all service level requirements should be performed formally on a periodic basis.

▸ Some example SLAs that could be defined:
  ▸ Cycle time between participant exit and follow-up
  ▸ Customer and participant feedback survey and expected ratings
  ▸ Case load assigned to each case manager
  ▸ Percentage of invoices returned with adjustment sheets

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Formal monitoring program

Observation	Leading practice
▸ TDLWD requires LWDBs to establish and execute tools and guides to outline how monitoring activities will be conducted. Through interviews and inspection of documentation, we noted the following control weaknesses: 　▸ The local monitoring policy implemented by LWDB has not been customized to reflect the specific monitoring activities taking place by the LWDB. 　▸ The monitoring over the OSO by Staff to the Board is performed informally and adhoc. There is not a defined monitoring schedule or documented process describing the monitoring activities. 　▸ The Staff to the Board has not performed a formal OSO monitoring review under the current contract. ▸ Per the local monitoring policy, LWDB is responsible for seeing that the fiscal agent has implemented quality controls to analyze funds in a proactive approach relative to state and federal guidelines on disallowed costs, MPCR and the required program allotment rate. Currently, the fiscal agent performs ongoing monitoring of compliance with WIOA; however, it is not clear whether there is a formal escalation and resolution process when noncompliance is identified. The LWDB has not developed written policies and procedures with sufficient level of detail to outline their monitoring activities	▸ Monitoring policies are updated and customized to reflect the specific needs of the area. Policies include detail over specific monitoring activities (who is being monitored), monitoring criteria (what is being monitored) and the monitoring schedule (when does monitoring occur). Monitoring is performed in line with documented policy. ▸ Documented escalation and resolution policies and procedures exist when service providers do not meet defined KPIs. Escalation protocols vary based on the risk of the performance indicator that is not being met.

Recommendations
▸ We recommend that the NETLWDA update its monitoring policy to include specifics around monitoring performed by the area. Included in this update should be escalation procedures detailing protocol for noncompliance with performance metrics.

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Manual processing and data integrity

There is a considerable amount of manual data entry required in various systems which are not integrated. This is a risk to data integrity, invoice timeliness and accurate reporting.

Observation	Leading practice

▸ WIOA performance measures largely rely on accurate and timely participant data entered into VOS. Currently, the process to enter this data is manual and susceptible to human error or untimely entry.
▸ The Fiscal Agent receives monthly invoices from service providers via email, with supporting documentation receives via standard mail. Invoices are not paid by the Fiscal Agent until grant funds have been requested and released by the TDLWD. Before funds are requested, the Fiscal Agent performs a detail review of the invoice to verify that expenses are within policy.
    ▸ The process to review invoices is tedious due to the volume of paper documents and manual reconciliation to Jobs4TN VOS. The Fiscal Agent may lack the appropriate staffing resources to timely review and process the large volume of paper documents.
    ▸ The level of the manual processing and time-consuming reviews may delay the process for requesting and receiving funds from the TDLWD, which increases the risk of delayed invoice payment to the OSO and CSPs and a potentially adverse effect on the provision of workforce services in the NETLWDA.
	▸ Systems are integrated to avoid duplicate data entry. This could be via system interfaces, data entry bots or other means.
	▸ All participant data should be either entered or reviewed by individuals trained specifically for reporting to verify that all necessary documents are uploaded in a consistent manner for each participant.
	▸ Optical character and matching technology are used to automatically agree invoices to supporting documentation. Manual intervention occurs only on an exception basis.

Recommendations

▸ We recommend that the NETLWDA explore automation opportunities, including optical character technology, matching technology and data entry bots to increase efficiency within the process and reduce the risk of human error.
▸ While data entry is still dependent on manual processes, we recommend implementing controls to monitor data quality (e.g., reconciliations between systems, review of key inputs).

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Enablement

Technology

Technology

The NETLWDA faces technology limitations that lead to process inefficiencies.

Focus area	Key observation
Jobs4TN/VOS	During NETLWDA interviews, individuals expressed challenges in staying up to date on the reporting requirements within VOS. There is confusion on the level of supporting documentation that must accompany participant cases due to the requirements often changing.
	The VOS system does not have the capability to notify case managers of data error (i.e., incorrect naming conventions) or missing requirements (fields left blank or missing documentation) when submitting participant case files. As a result, users must manually review participant case files to check for completeness and accuracy.
System integration	There is a lack of integration between IT systems (Grants4TN, Jobs4TN and ABILA, the accounting system utilized by the Fiscal Agent) causing a large degree of manual reconciliation and increasing the risk of inaccurate reporting. For example, participant payments must be appropriately allocated to the correct program funding stream in VOS. This data must then be accurately recorded in Grants4TN by the Fiscal Agent when requesting funds from the State.

Recommendations

▶ We recommend that the NETLWDA consider the feasibility of implementing integrations between systems to avoid duplicate data entry. This could be via system interfaces, data entry bots, optical character technology, matching technology or other means.

▶ We recommend implementing data validation checks within the VOS system functionality, specifically in areas where there are frequent errors.

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Enablement

Skills and communication

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Skills and communication

There are opportunities to optimize communication channels with TDLWD and among NETLWDA stakeholders to increase collaboration and strengthen relationships.

Focus area	Key observation
Skills	Based on our interviews with the Fiscal Agent and Board Staff, these individuals have the appropriate level of competency to execute their role activities and responsibilities within the NETLWDA. The following factors may be limiting the LWDB's ability to effectively carryout its mission and purpose: ▸ Composition, diversity and size ▸ Having too many board members may limit member engagement and involvement ▸ Lack of awareness and understanding of general roles and responsibilities as board members
Communication	There appears to be breakdowns in communication between the TDLWD and LWDAs in regard to key policies, messages and questions. There is confusion over allowable and appropriate the level of communication due to the firewall. This hinders communication as stakeholders are hesitant to further communicate to avoid trespassing the firewall.

Recommendations

▸ We recommend reexamining the responsibilities of the LWDB to determine precise size and necessary skill sets and knowledge (e.g., financial resource, knowledge of policies and regulations). Consider limiting the size of the LWDB to a size that allows for a quorum to be present at meetings and for there to be meaningful participation of all members.

▸ Consider implementing board orientation and continuous board education in addition to or as part of existing board meetings.

▸ Develop a communication that includes practical examples of firewall allowed and disallowed communication topics for NETLWDA to better understand the appearance of conflict of interest provision.

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Appendices

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Appendix A: RACI Matrix

Activity	Sub-activity	TDLWD/ central office	Regional director	CLEO/LEOs	LWDB	Fiscal agent	Executive director/staff to the board	OSO	Career service provider	Other
Vendor due diligence	Define procurement policies	R	I		C/I	R/A	C			
	Define procurement processes, tools and templates	R		I	R/A	R				
	Perform sourcing risk management				I		R/A			
	Action procurement policy noncompliance	R	C/I	C/I	C/I	R	R/A			
Vendor selection	Prepare and conduct market assessment						R/A			
	Develop RFP to include KPIs and targets				I	I	R/A			
	Review and approve RFP				R/A		C			
	Distribute RFP						R/A	I	I	
	Prepare and conduct sourcing and bid event (Bidders Conference)				I		R/A	I	I	
	Conduct sourcing evaluations				R/A		I			
	Select vendor		I		R/A		I	I	I	

R − Responsible, A − Accountable, C − Consulted, I − Informed

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Appendix A: RACI Matrix

Activity	Sub-activity	TDLWD/central office	Regional director	CLEO/LEOs	LWDB	Fiscal agent	Executive director/staff to the board	OSO	Career service provider	Other
Contract and grant management	Contract creation and authorization			R	R/a		R	R	R	
	Contract execution				I	I	I	R	R	
	Contract monitoring				R/A	R	R	C	C	
	Contract compliance				R/A		R	I	I	
Operational compliance and monitoring	Determine operational KPIs				R/A		R			
	Monitor and track performance against operational KPIs				A	C	R	C	C	
	Execute performance reviews				A	C	R			
	Report scorecards and performance results			I	A		R	I	I	
Regulatory compliance and monitoring	Develop NETLWDA Strategic Plan	I		R	A		R			
	Communicate regulatory requirements and policy changes	R/A		I	I		R	I/R	I	
	Monitor and track performance against negotiated performance measures				A		R	C	C	
	Monitor and track performance against fiscal requirements				A	C	R	C	C	
	Execute performance reviews				A	C	R	I/C	I/C	
	Report scorecards and performance results	R/A			I		R/I	I	I	
	Identify and correct noncompliance	R								

R – Responsible, A – Accountable, C – Consulted, I – Informed

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Appendix A: RACI Matrix

Activity	Sub-activity	TDLWD/ central office	Regional director	CLEO/LEOs	LWDB	Fiscal agent	Executive director/staff to the board	OSO	Career service provider	Partners	Other
Financial management	Develop NETLWDA Budget	I			R/A	R	R				
	Approve NETLWDA Budget			R	R/A		R				
	Develop IFA	C/I			R	R	R	C	C	C	
	Approve IFA										
	Prepare expenditure reports	I				R/A					
	Review and approve expenditure reports	R/A	I			R					
	Review OSO and CSP Invoices					R/A		C	C		
	Pay OSO and CSP invoices and expenses					R/A		I	I	I	
	Pay operating expenses					R/A					
	Submit reimbursement claims	I/C				R/A					
	Monitor expenditures			A	I	R	R/I	C	C	C	

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Local Board provides State Board and Central Office Strategic Plan and other performance, financial and administrative information as needed. State Board and Central Office provide quarterly report card to NETLWDA.

TDLWD State Workforce Development Board + Central Office

Regional Director receives performance report as member of the Local Workforce Development Board.

The Firewall prevents Fiscal Agent and Staff to the Board from managing day-to-day operations of AJC programs and services.

Chief Local Elected Official (CLEO) + Local Elected Officials (LEOs)

Local Workforce Development Board

TDLWD Regional Director

Firewall

Fiscal Agent

NETLWDA Executive Director and Staff to LWDB

Agency for Business and Training (AB&T)

One-Stop Operator (OSO)

Knoxville Community Action Committee (CAC)

WIOA Contracted Service Providers

American Job Center (AJC) Site Leads

Partner Agency Leads

First TN Human Resource Agency

Virtual One-Stop System (VOS)

WIOA Contracted Service Providers, OSO, AJC Site Staff, OSO, Partner Agency Staff, Fiscal Agent and Staff to the Board all use VOS system to input performance and financial data for State reporting.

→ Financial reporting includes adherence to financial and fiscal requirements and responsibilities.
→ Performance targets reporting includes operational and regulatory requirements and responsibilities.

Appendix C: Technology Landscape

System	Purpose	Users	Key usage areas			Risks and Observations
			Financial Management	Performance and Contract Management	One Stop Job Center Operations	
Jobs4TN/VOS	Collect and maintain customer data as a part of the referral process. Repository for referrals and other metrics are available through Jobs4TN to the State to develop performance reports.	AJC Staff, TDLWD, OSO and participants		X	X	Data integrity issues due to lack of clear instructions regarding documents that must be uploaded and duplicate data entry.
Grants4TN	Used to maintain records of financial transactions and to request funds from the State. Also used to evaluate performance regarding financial requirements.	Fiscal Agent, TDLWD	X	X		Data is manually entered into the accounting system then again in Grants4tn – no communication between the two. This is a very timely process and also poses the risk of data integrity.
ABILA	Used to keep accounting records, produce checks and assign allocated costs based on agreed-upon allocation methods.	Fiscal Agent	X	X		
EMSI (Economic Modeling Systems International)	Internal report generating tool used for labor market analysis. It used to identify skills gaps and in-demand industries, in an effort to meet the LWDA's specific needs.	Staff to the Board, Fiscal Agent		X	X	Limited risks, as it is only used to generate reports. But there is concern that funding for this system will not be approved in the near future.
Google Referral System	Used to connect customers with all relevant partners, increasing the number of co-enrollments in the area.	OSO, Partners, Staff		X	X	System is yet another instance of duplicate data entry (data integrity issue). System relies heavily on user knowledge of partners and eligibility requirements. These risks create potential for a referral of a customer to a service they are ineligible for. (Still a fairly low risk system, as it not used for reporting purposes, but rather to increase co-enrollment. Other controls are in place to confirm that the customer is eligible for any program they participate in.)

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